

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

In re: Ace C. Fouts and
Theresa R. Fouts,

Case No 19-30988

Chapter No. 7

Debtors

Judge Laura K. Grandy

MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

John C. Caraker and Deighan Law LLC d/b/a UpRight Law LLC (“UpRight Law”), by and through counsel, hereby move for entry of a stipulated protective order.

The United States Trustee has agreed to entry of a stipulated protective order to cover documents produced by any of the parties including in relation to Rule 2004 examinations and associated requests for documents. This Order is identical to the Order entered in the case of *In re: Potter*, 19-60216 (Doc. 56). The parties request entry of the proposed order attached as Exhibit A.

For the foregoing reasons, the Court is respectfully requested to grant the relief sought.

Respectfully submitted,

/s/ Charles A. Armgardt
Charles A. Armgardt
Of Counsel
UpRight Law LLC
79 W. Monroe, 10th Floor
Chicago, IL 60603
312-792-9533
carmgardt@uprightlaw.com

Counsel for Mr. Caraker and UpRight
Law LLC

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was served upon all counsel of record via CM/ECF filing system and to the debtor listed below via regular first-class mail, proper prepaid postage and deposited at a U.S. Mailbox in Chicago, Illinois on or about March 24, 2020

Ace & Theresa Fouts
604 Villa Dr
Belleville, IL 62223

/s/ Charles A. Armgardt
Charles A. Armgardt